

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

M. KATHLEEN McKINNEY, Regional
Director of Region 15 of the National Labor
Relations Board, for and on behalf of the
NATIONAL LABOR RELATIONS BOARD,

Petitioner,

v.

STARBUCKS CORPORATION,

Respondent.

No. 2:22-cv-02292-SHL-cgc

**RESPONDENT'S EMERGENCY MOTION TO STAY PENDING APPEAL OR IN THE
ALTERNATIVE EXTEND THE DEADLINE FOR COMPLIANCE**

Respondent Starbucks Corporation ("Respondent"), by and through counsel, and pursuant to Federal Rule of Appellate Procedure 8, hereby files this emergency motion to stay the Court's injunctive order [Doc 86] pending appeal. As fully detailed in the accompanying memorandum, a stay is necessary because the balance of equities weighs in favor of a stay. In the alternative, Starbucks requests an extension of the Court's five-day deadline to offer reinstatement of either 14 days or until such date as the U.S. Court of Appeals for the Sixth Circuit rules on the Motion to Stay Pending Appeal that Respondent will file with the Sixth Circuit.

Respectfully submitted this 21 day of August 2022.

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**ATTORNEYS FOR RESPONDENT
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CERTIFICATE OF CONFERENCE

I certify that on August 21, 2022, counsel for Respondent conferred by email with counsel for Petitioner regarding this motion. Respondent's counsel informed Petitioner that it would be filing the motion on August 21, 2022 due to the time sensitive nature. Counsel for Respondent did not receive a response prior to filing.

/s/ Arthur T. Carter

CERTIFICATE OF SERVICE

I certify that the foregoing document has been electronically filed with the Clerk of the Court by using the CM/ECF system, which will in turn send a notice of the electronic filing to all counsel of record, on this 21st day of August 2022.

/s/ Arthur T. Carter